

SUMMONS

STATE OF ALABAMA )  
BALDWIN COUNTY )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA.....GREETINGS:

You are commanded to summons Roy N. Nelson individually and D/B/A Fort Morgan Concession to appear befor the Circuit Court, to be held for said County at the place of holding same, within thirty days (30) from service of this process, then and there to answer the complaint of Frank Sturges and Frank Sturges III, a co-partnership D/B/A Magnolia Marine Service.

*Witness my hand this 18<sup>th</sup> day of June 1957*  
*Heise J. Duck*  
*clerk*

COMPLAINT

FRANK STURGES and  
FRANK STURGES III,  
a co-partnership D/B/A  
MAGNOLIA MARINE SERVICE

PLAINTIFF

VS

ROY N. NELSON  
INDIVIDUALLY and  
D/B/A FORT MORGAN  
CONCESSION

DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

3876

I

The Plaintiff claims of the defendant One Hundred Twenty Seven Dollars and Seventy Cents (\$127.70), due from him on account, to wit: the 25th day of July 1957, which sum of money, with interest thereon, is still unpaid.

II

The Plaintiff claims of the Defendant One Hundred Twenty Seven Dollars and Seventy Cents (\$127.70), due from him for merchandise, goods and chattles sold by the Plaintiffs to the Defendant on, to wit: the 25th day of July 1957, which sum of money, with interest thereon, is still unpaid.

est thereon, is still unpaid.

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JAMES A. BRICE



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RICHARD C. LACEY

ATTORNEYS FOR PLAINTIFF

There is attached hereto as Exhibit A and made a part hereof, an itemized statement of account verified by affidavit of Frank Sturges III, a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 25th day of July, 1957, and due at present.

The defendant resides at Gulf Shores, Alabama.

# MAGNOLIA MARINE SERVICE

P. O. BOX 1666

PHONE Whitehall 3-4771

Foley, Ala. ~~Mar. 24, 1958~~ 19\_\_

In account with

Roy N. Nelson d/b/a  
Fort Morgan Concession,  
Gulf Shores, Alabama.

All accounts are due and payable tenth of month following date of purchase

Date	Detail	Debit	Credit	Balance
1957				
Jan. 1	Balance due			44.29
Apr. 4	3956-57R	99.96		144.25
27	4039R	28.15		172.40
May 3	4067R	3.60		176.00
16	4105R	7.92		183.92
22	4125R	12.07		195.99
29	4141R	15.84		211.83
Jun. 6	4164R	5.97		217.80
17	4205R	1.80		219.60
Jul. 25	4365R	6.30		225.90
Aug. 19	4466R	1.80		227.70
	Check		100.00	127.70

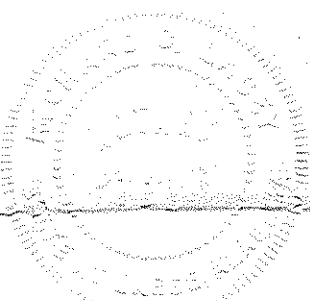
AFFIDAVIT

Before me, Richard C. Lacey, a Notary Public in and for said County in said State, personally appeared Frank Sturges III, who being by me first duly sworn, deposes and says; that he is a co-partner of Magnolia Marine Service; that the annexed statement of the account of said Magnolia Marine Service against Roy N. Nelson D/B/A Fort Morgan Concession of Gulf Shores, Alabama is just, true and correct; that there is now due on said account One Hundred Twenty Seven Dollars and seventy cents (\$127.70), after deducting all credits, set-offs or counterclaims.

Frank Sturges III  
FRANK STURGES III

Sworn to and subscribed before me this 15th day of June, 1959. Witness my hand and official seal.

Richard C. Lacey  
NOTARY PUBLIC



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*Witness my hand this 18<sup>th</sup> day of June 1957*

*N.F.*

COMPLAINT

*W. J. Newkirk*  
*clerk*

FRANK STURGES and  
FRANK STURGES III,  
a co-partnership D/B/A  
MAGNOLIA MARINE SERVICE

PLAINTIFF

VS

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JAMES A. BRICE

  
RICHARD C. LACEY

ATTORNEYS FOR PLAINTIFF

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The defendant resides at Gulf Shores, Alabama.

# MAGNOLIA MARINE SERVICE

P. O. BOX 1666

PHONE Whitehall 3-4771

Foley, Ala. Mar. 24, 1958 19\_\_

In account with

Roy N. Nelson o/b/a  
Port Morgan Concession,  
Gulf Shores, Alabama.

All accounts are due and payable tenth of month following date of purchase

Date	Detail	Debit	Credit	Balance
1957				
Jan. 1	Balance due			44.29
Apr. 4	3956-57R	99.96		144.25
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Frank Sturges III  
FRANK STURGES III

Sworn to and subscribed before me this 15<sup>th</sup> day of June, 1959. Witness my hand and official seal.

Richard C. Lacey  
NOTARY PUBLIC



Returned 26 day of Aug  
Not found in my county after diligent search and  
bury.  
By Jayler W. H.

Received 28 day of Aug 1955  
and on \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_  
I served a copy of the within \_\_\_\_\_ 19\_\_\_\_  
on Jay \_\_\_\_\_  
\_\_\_\_\_ 19\_\_\_\_ By service on \_\_\_\_\_

By Taylor Williams Sheriff  
Chadwick Deputy Sheriff

TAYLOR WILKINS, Sheriff  
By          atty

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RECORDED

Frank E. Surges

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Roy N. Nelson

FILED  
JUN 10 1959  
ALICE L. DUCK, CLERK  
REGISTER

